

## UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

September 17, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASUnited States of America  
v.BY: ac  
DEPUTYCase No. SA-24-MJ-**1309**

JONNI ROBIN CARVILLE

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 11, 2024 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(o)

Illegal possession of a Machine Gun

Penalties: Up to 10 Years Imprisonment, \$250,000 Fine, 3 Years Supervised Release,  
\$100 Mandatory Special Assessment

26 U.S.C. § 5861(d)

Possession of a unregistered firearm

Penalties: Maximum 10 Years Imprisonment, \$10,000 Fine, 3 Years Supervised  
Release, \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.KEDARIUS HARRIS Digitally signed by KEDARIUS HARRIS  
Date: 2024.09.16 18:25:17 -05'00'*Complainant's signature*

Kedarius Harris, Special Agent - ATF

*Printed name and title*☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: September 17, 2024City and state: San Antonio, Texas*Judge's signature*

Hon. Henry J. Bemporad, U.S. Magistrate Judge

*Printed name and title*

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Kedarius Harris, being duly sworn do hereby depose and state:

1. Your affiant is currently employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and has been so employed since December 2018. Since January 2018, your affiant has participated in investigations concerning violations of Title 18 and Title 26.
2. On September 08, 2024, Wilson County Sheriff Office (WCSO) Deputies received call notes from Comal County Sheriff's Office (CCSO) indicating a caller by the name of "John" using the telephone number of 830-865-6169, had contacted the Comal County Crisis hotline stating that he had plans on hurting and killing a lot of people on Thursday, September 12<sup>th</sup>, 2024. Wilson County Dispatchers were able to cross the information to **JONNI ROBIN CARVILLE**, at the address of 128 Circle Six Drive, LaVernia, Texas. Pursuant to the call notes received from the Comal County Sheriff's Office, Wilson County Sheriff Deputies conducted a welfare check at the residence.
3. Upon arrival at **CARVILLE's** residence, WCSO Deputies were able to identify the male subject at the residence as **CARVILLE**, however, **CARVILLE** refused to open the door and only wanted to speak to Texas Department of Public Safety Troopers (DPS) who were on the scene. While on the scene, WCSO Deputies were advised via dispatch that the Veterans Affairs (VA) Crisis line requested a well-fare check as well due to the multiple received calls from that morning stating that **CARVILLE** made threats of raping and killing people that caused him trauma. DPS Troopers on scene were able to contact **CARVILLE's** wife, and she advised that she did not feel that her life was in danger, but **CARVILLE** needed to receive mental health assistance. WCSO Deputies and DPS Troopers cleared the scene after being advised by **CARVILLE's** wife.
4. On September 11, WCSO executed a state arrest warrant on **CARVILLE**. **CARVILLE** was apprehended by WCSO and transported and booked for Terroristic Threats. WCSO also executed a state search warrant for the residence of **JONNI CARVILLE**. During the search of **CARVILLE's** residence, WCSO Deputies discovered a dozen or more AR-Style firearms in plain view as well as dozens of rifles, handgun cases, and ammunition in the residence.
5. On September 13, 2024, ATF Special Agent (SA) KD Harris conducted function tests on one (1) PTR Industries, INC, .308 caliber rifle and on one (1) Special Weapons INC, 9mm caliber rifle at the Wilson County Sheriff's Office. These firearms were both recovered during the execution of the WCSO state search warrant at **CARVILLE's** residence. The PTR Industries firearm was located in the office of the residence on the

floor and the Special Weapons INC firearm was located in the master bedroom of the residence inside the closet. Both firearms functioned as fully automatic when the selector level of the firearm receiver is operated on level "F." Below are images of the receivers of the above firearms depicting the level functions. Selector level "S" which function as safe, "E" which function as Semi-Automatic and selector lever "F" which function as a fully automatic. Based on this function, the two firearms fit the definition of a machine gun.



6. A query of the National Firearms Registration and Transfer Record System of **JONNI CARVILLE** revealed that he does not have any NFA firearms registered, and a query of the Federal Licensing System of **JONNI CARVILLE** revealed that he is not a registered Federal Firearm Licensee. Therefore, he is not allowed to possess a fully automatic gun like the two firearms depicted above.

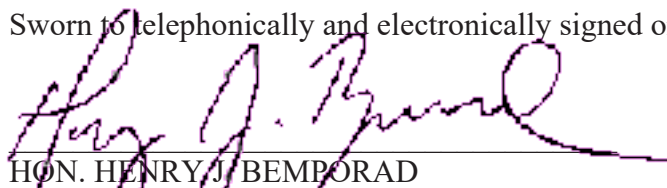
Based on the above facts, your affiant believes that there is probable cause that **JONNI ROBIN CARVILLE** possessed unregistered NFA items, including (2) two machine guns which is, in violation of Title 18 U.S.C. §922(o) – Illegal Possession of a Machine Gun and Title 26 U.S.C § 5861(d) – Possession of Unregistered Firearm.

KEDARIUS  
HARRIS

Digitally signed by KEDARIUS  
HARRIS  
Date: 2024.09.16 18:25:56 -05'00'

Special Agent Kedarius Harris  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to telephonically and electronically signed on the 17th day of September, 2024

  
HON. HENRY J. BEMPORAD  
UNITED STATES MAGISTRATE JUDGE